

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

CONCORD AUTO BODY, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:14-CV-01857-JAR
	)	
STATE FARM MUTUAL AUTO INSURANCE	)	Judge John A. Ross
COMPANY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**STIPULATED MOTION TO STAY PROCEEDINGS PENDING A TRANSFER  
DECISION BY THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

Defendants Allstate Fire and Casualty Insurance Company, Allstate Insurance Company, Allstate Property and Casualty Insurance Company, and Esurance Property and Casualty Insurance Company (collectively “the Allstate Defendants”)<sup>1</sup> and Plaintiff Concord Auto Body, Inc. respectfully move this Court for an order granting a stay as to all proceedings in the above-captioned Action (“Action”) pending a decision by the Judicial Panel on Multidistrict Litigation as to whether to transfer this Action to *In re Auto Body Shop Antitrust Litig.*, MDL No. 2557, that is currently pending before Judge Gregory A. Presnell in the Middle

---

<sup>1</sup> Counsel for the Allstate Defendants have attempted to contact counsel for all Defendants in this Action, requesting concurrence in the relief sought. Although counsel for the Allstate Defendants have not appeared on behalf of any other Defendant in this Action, the following Defendants consent to the filing of the Motion: American Family Mutual Insurance, Farmers Insurance Company, Inc., Liberty Mutual Fire Insurance Company, LM General Insurance Company, Safeco Insurance Company of Illinois, Progressive Casualty Insurance Company, Progressive Advanced Insurance Company, Progressive Preferred Insurance Company, Progressive Direct Insurance Company, Progressive Northwestern Insurance Company, Shelter Mutual Insurance Company, and Travelers Home and Marine Insurance Company. Counsel for the Allstate Defendants did not receive a response from the other Defendants.

District of Florida. The grounds for this Stipulated Motion are set forth in the Memorandum in Support filed herewith.

Dated: November 20, 2014

Respectfully submitted,

/s/ Deborah C. Druley (w/consent)

Deborah C. Druley (MO# 54625)

deborah.druley@dentons.com

DENTONS US LLP

One Metropolitan Square

211 N. Broadway, Suite 3000

St. Louis, MO 63102-2741

Phone: (314) 241-1800 / Fax: (314) 259-5959

Richard L. Fenton

richard.fenton@dentons.com

DENTONS US LLP

233 S. Wacker Drive, Suite 7800

Chicago, IL 60606

Phone: (312) 876-8000

Fax: (312) 876-7934

COUNSEL FOR THE ALLSTATE  
DEFENDANTS

/s/Tonna K. Farrar (w/permission)

Tonna K. Farrar (MO #46270)

tfarrar@bffb.com

Van Bunch

Eric D. Zard

BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.

2325 East Camelback Road, Suite 300

Phoenix, AZ 85016

Phone: (602) 274-1100

COUNSEL FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2014, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Tonna K. Farrar  
Van Bunch  
Eric D. Zard  
BONNETT, FAIRBOURN, FRIEDMAN  
& BALINT, P.C.  
2325 East Camelback Road  
Suite 300  
Phoenix, AZ 85016

I further certify that a copy of the foregoing has been served upon the following parties by first class U.S. Mail, postage prepaid, on November 20, 2014:

State Farm Mutual Automobile Ins. Co  
State Farm Fire and Casualty Company  
One State Farm Plaza  
Bloomington, IL 61710

American Family Mutual Ins. Co.  
6000 American Parkway  
Madison, WI 53783-0001

Shelter Mutual Insurance Company  
1817 West Broadway  
Columbia, MO 65218

Farmers Insurance Co., Inc.  
10850 Lowell Avenue  
Overland Park, KS 66210-1667

Automobile Club Inter-Insurance Exchange  
3333 Fairview Road  
Mail Stop A357  
Costa Mesa, CA 92626-1698

Safeco Insurance Company of Illinois  
175 Berkeley Street  
Boston, MA 02116

GEICO Casualty Company  
GEICO General Insurance Company  
GEICO Indemnity Company  
One GEICO Plaza  
Washington, DC 20076-0001

Government Employees Insurance Company  
One GEICO Plaza  
Washington, DC 20076-0001

Progressive Casualty Insurance Company  
Progressive Advanced Insurance Company  
Progressive Preferred Insurance Company  
Progressive Direct Insurance Company  
Progressive Northwestern Insurance Co  
P.O. Box 89490  
Cleveland, OH 44101-6490

Farm Bureau Town & Country Insurance  
Company Of Missouri  
P.O. Box 658  
Jefferson City, MO 65102

Allied Property & Casualty Ins. Co.  
1100 Locust Street, Dept. 2007  
Des Moines, IA 50391-2007

United Services Automobile Association  
9800 Fredericksburg Road  
San Antonio, TX 78288

USAA Casualty Insurance Company  
Liberty Mutual Fire Insurance Company  
175 Berkeley Street  
Boston, MA 02117

LM General Insurance Company  
175 Berkeley Street  
Boston, MA 02117

Cornerstone National Insurance Company  
P.O. Box 6040  
Columbia, MO 65205-6040

Safe Auto Insurance Company  
4 Easton Oval  
Columbus, OH 43219

USAA General Indemnity Company  
9800 Fredericksburg Road  
San Antonio, TX 78288

American Standard Ins. Co. of Wisconsin  
6000 American Parkway  
Madison, WI 53783-0001

The Travelers Home And Marine Insurance  
Company  
One Tower Square  
Hartford, CT 06183

Nationwide Affinity Ins. Co. Of America  
One Nationwide Plaza  
Columbus, OH 43215-2220

Nationwide Insurance Company Of America  
1 W. Nationwide Blvd  
DSPF-76  
Columbus, OH 43215-2220

/s/ Deborah C. Druley  
Deborah C. Druley (#54625MO)  
deborah.druley@dentons.com  
DENTONS US LLP  
One Metropolitan Square  
211 N. Broadway, Suite 3000  
St. Louis, MO 63102-2741  
Phone: (314) 241-1800  
Fax: (314) 259-5959

COUNSEL FOR THE ALLSTATE  
DEFENDANTS